

United States District Court

NORTHERN

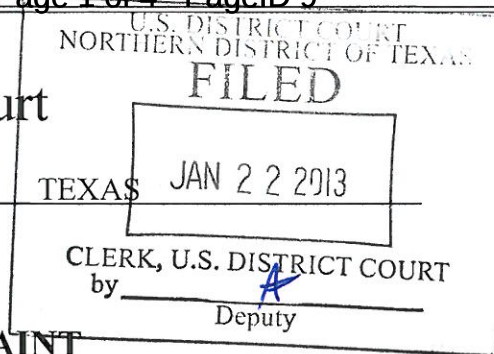
DISTRICT OF

UNITED STATES OF AMERICA

V.

CLIFTON DION CLOWERS (1)
AMY NICOLE BALDWIN (2)

COMPLAINT

CASE NUMBER: 3-13-MJ-44-BK

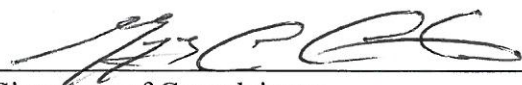
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 22, 2013 in Dallas County, in the Northern District of Texas defendants did,

knowingly steal and take from and out of an authorized depository for mail matter, namely U.S. Postal Service blue collection boxes at the Parkdale Station, 7720 Military Parkway, Dallas, Texas, in violation of Title 18 United States Code, Section(s) 1708.

I further state that I am a(n) U.S. Postal Inspector of the U. S. Postal Inspection Service and that this complaint is based on the following facts:

See attached Affidavit of U.S. Postal Inspector Gregory C. Carter, USPIS, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


Signature of Complainant
GREGORY C. CARTER
U.S. Postal Inspector, USPIS

Sworn to before me and subscribed in my presence, on this 22 day of January 2013, at Dallas, Texas.

RENEE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Inspector Gregory C. Carter, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about January 22, 2013, in the Dallas Division of the Northern District of Texas, **CLIFTON DION CLOWERS and AMY NICOLE BALDWIN**, defendants, did unlawfully have in their possession mail matter, specifically a First Class letter from A.M. of Dallas, Texas, which had been stolen, taken, embezzled and abstracted from the United States mail, knowing said mail matter to have been stolen in violation of 18, U.S.C. § 1708.

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS), and have been so employed since April 2003. I am currently assigned to the Mail Theft/Violent Crimes Team for the Fort Worth Division, and I am responsible for investigating mail theft, robberies, burglaries, threats, assaults and identity theft cases involving the U.S. Mail.

2. On the evening of January 21, and the morning of January 22, 2013, U.S. Postal Inspectors John W. Freyman and I were conducting surveillance activities of the blue USPS collection boxes at the Parkdale Station, 7720 Military Parkway, Dallas, TX. Surveillance was being conducted at this location because of the high number of mail theft complaints at the blue USPS collection boxes, via a method known as "Fishing". "Fishing" is the use of a weighted object, attached to a string, covered in a sticky substance (typically rat trap glue or melted glue sticks), and placing the object in a blue USPS Collection Box in an attempt to retrieve outgoing U.S. Mail.

3. On January 22, 2013, at approximately 3:55 a.m. I observed a black Pontiac G6 2-door pull up to the blue USPS collection boxes at Parkdale Station for approximately 1-2 minutes, inching forward slightly and stopping at all three boxes. I was able to view what appeared to be white envelopes being removed from the collection boxes by the passenger, with the use of what appeared to be a white vertical blind. The suspect vehicle then left the area traveling westbound on Military Parkway. Coming from the north, I was able to catch up to the Pontiac G6 at the 7900 block of Military Parkway. I activated my emergency lights and I commenced a traffic stop in the roadway, outside lane, on Military Parkway. Three individuals were identified in the vehicle and upon arrival of Inspector Freyman, all three were removed from the vehicle, handcuffed, and placed under arrest. Dallas Police Department Officers arrived on scene a short time later and assisted with the detention of the suspects. Clowers was identified as the driver of the

vehicle and Baldwin was identified as the passenger in the front seat, in the rear seat of the vehicle was another individual. Incident to their arrest, I promptly read each of the individuals their Miranda Warnings.

4. Inspector Freyman and I then conducted a search of the vehicle and found a fishing device, consisting of a vertical blind, and covered in a sticky glue-like substance. In addition, approximately 10 pieces of first-class U.S. Mail, none of which contained an addressee or sender in the name of Clowers, Baldwin, or the other passenger. Several of the recovered pieces of U.S. Mail contained a sticky glue-like substance similar to that found on the fishing device. In addition, most of the recovered U.S. Mail had not been cancelled, indicating the mail had been placed in the blue USPS collection box awaiting pick-up and delivery. Stolen U.S. Mail was found on the driver side near Clowers, passenger side near Baldwin, and in the back seat of the vehicle near the other passenger.

5. On January 22, 2013, Inspector Carter contacted A.M. of Dallas, TX, who stated that he had placed a piece of first-class mail in the blue USPS Collection Box at Buckner and Seco, Pleasant Grove Shopping Center, Dallas, TX sometime the previous evening. A.M. stated he did not authorize anyone, other than the intended recipient, to possess the piece of mail. The piece of mail belonging to A.M., to include a personal check, was found by Inspector Freyman in the front passenger side floor of the 2006 Pontiac G6, bearing Texas tag BJW 9135, registered to Baldwin.

6. Based upon the foregoing facts and information, I submit there is probable cause to believe that CLOWERS and BALDWIN did knowingly have in their possession, a letter which was stolen, taken, embezzled and abstracted from the United States mail in violation of Title 18, USC Section 1708.



Gregory C. Carter
U.S. Postal Inspector

Sworn to before me, and subscribed in my presence on Jan. 27, 2013 at
12:30 p.m., at Dallas, Texas.



RENEE HARRIS TOLIVER
United States Magistrate Judge